

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	:	
In re	:	Chapter 11
	:	
1121 PIER VILLAGE LLC, <i>et al.</i> , ¹	:	Case No. 21-11466-ELF
	:	
Debtors.	:	Jointly Administered
	:	

**MOTION FOR ADMISSION *PRO HAC VICE* OF
DEBORAH KOVSKY-APAP, ESQUIRE**

Francis J. Lawall, Esquire (the “Movant”), a member in good standing of the bar of the United States Bankruptcy Court for the Eastern District of Pennsylvania and a partner with the law firm of Pepper Hamilton LLP, hereby moves this Court to enter an order permitting Deborah Kovsky-Apap, Esquire, to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Pennsylvania in the above-captioned Chapter 11 bankruptcy case and in any adversary proceedings therein. In support of this motion, the Movant respectfully represents as follows:

1. Ms. Kovsky-Apap is a partner in the law firm of Troutman Pepper Hamilton Sanders LLP and maintain an office at 4000 Town Center, Suite 1800, Southfield, Michigan 48075-1505.

2. As set forth in the Verified Statement attached hereto as **Exhibit A**, she is a member in good standing of the Bars of the States of Michigan, New Jersey and New York, and the Bars of the Supreme Court of the United States, the U.S. Court of Appeals for the Sixth Circuit, the U.S. District Court for the District of New Jersey, the U.S. District Court for the

¹ 1121 Pier Village LLC, Penn Treaty Homes LLC, 2626 Frankford LLC, 285 Kingsland LLC, 231 E 123 LLC and 193 Hancock LLC (collectively the “Debtors”).

Eastern District of Michigan, the U.S. District Court for the Western District of Michigan and the U.S. District Court for the Southern District of New York.

3. Ms. Kovsky-Apap has not been disbarred or suspended from the bar of any court or otherwise subjected to professional discipline by any court before which I have been admitted to practice.

4. She is not currently subject to any disciplinary proceedings.

5. Ms. Kovsky-Apap and the firm of Troutman Pepper Hamilton Sanders LLP have been retained by PV DL LLC to represent its interests in the above-captioned Chapter 11 bankruptcy case and in any adversary proceedings therein.

WHEREFORE, the Movant respectfully requests that the Court enter an order, in the form filed herewith, permitting Deborah Kovsky-Apap, Esquire to appear *pro hac vice* in association with the Movant on behalf of PV DL LLC in the above-captioned Chapter 11 bankruptcy case and in any adversary proceedings therein.

Date: September 14, 2021

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP

/s/ Francis J. Lawall

Francis J. Lawall

3000 Two Logan Square

Eighteenth and Arch Streets

Philadelphia, PA 19103-2799

Telephone: (215) 981-4481

Facsimile: (215) 981-4750

Email: francis.lawall@troutman.com

- and-

Deborah Kovsky-Apap (*pro hac vice*
pending)

4000 Town Center, Suite 1800

Southfield, MI 48075

Telephone: (248) 359-7331

Facsimile: (248) 731-1572

Email: deborah.kovsky@troutman.com

Counsel for PV DL LLC